Saskatchewan

Saskatchewan
Workers'
Compensation
Board

1840 Lorne Street
Regina, Canada
S4P 2L8

(306) 565-4370

18 March 1985.

85-5614/

Honourable Lorne McLaren,
Minister of Labour,
Room 346 Legislative Building,
Regina, Saskatchewan.

Dear Mr. McLaren:

Re: Asbestos Review Committee

Attached herewith are four copies of the Report of the Asbestos Review Committee, also a brief summary list of the Recommendations.

The Report is in two sections, the first covering recommendations as outlined in the terms of reference with explanations. The second section deals with the more specific details of handling of asbestos as it relates to the work place.

The Committee and myself as Chairman feel that it may well be appropriate and serve a very useful need if top officials of Saskatchewan Power Corporation wished to meet with the Committee to discuss in more detail the contents of the Report.

Sincerely,

Robert McWillie,
Chairman,
Asbestos Review Committee.

Attach.

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Regina, Canada
S4P 2L8

(306) 565-4370

14 March 1985.

Dr. Rosemary Marchant,
1020 Aird Street,
Saskatoon, Saskatchewan.
S7N 0T1

Dear Rosemary:

The Asbestos Review Committee has concluded its report and it will probably be submitted to the Minister of Labour the beginning of next week.

On behalf of the Committee as Chairman I wish to express to you our deep appreciation for your concern and research work on matters raised by the Committee Members.

The wiilingness to share your knowledge and expertise contributed significantly in arriving at conclusions contained in the report.

Best wishes.

Sincerely,

Robert McWillie,
Chairman,
Asbestos Review Committee.

ASBESTOS REVIEW COMMITTEE

Brief summary list of Recommendations
(Refer to the Report for additional recommendations and details).

Recommend

(1) That asbestos be eliminated on new installations, and that existing asbestos on all Saskatchewan Power Corporation property be identified, and either removed or secured to insure no health risks to its workers or the public.

(2) That a building data sheet be established for each of its buildings on Saskatchewan Power Corporation property with a central building Registry containing all asbestos and its conditions be determined, and with provision for updating from time to time.

(3) That appropriate training of supervisors and staff be implemented, particularly those who are involved with asbestos.

(4) Establish a centralized documentation centre for asbestos exposed workers in cooperation with The Workers' Compensation Board.

(5) The Minister of Labour should explore with other persons in the private sector doing asbestos work for Saskatchewan Power Corporation to insure adequate training and reporting procedures for their employees.

(6) That appropriate Training by Occupational Health and Safety Branch, Department of Labour officials for Occupational Health Committee members be instituted to more clearly define the administration and application of the Committees and the Act.

(7) That a central Safety Council be established within Saskatchewan Power Corporation for coordinating all safety matters and which reports directly to the President of the Saskatchewan Power Corporation.

(8) That an Asbestos Committee be set up within Saskatchewan Power Corporation to assist and complete the task that lies ahead in the area of asbestos as outlined in the Report.

SASKATCHEWAN POWER

ASBESTOS REVIEW

COMMITTEE

REPORT

1985-03-13

Regina, Saskatchewan
1985 March 13

Honourable Lorne McLaren
Minister of Labour
346 Legislative Building
Regina, Saskatchewan.

The following is the report of the Saskatchewan Power Corporation Asbestos Review Committee which your office established with the following terms of reference:

To review the procedures for handling asbestos within the Saskatchewan Power Corporation. The Chairman is granted authority to invite comment from such members of the workforce, management, government or private sector as may be necessary to assist the Committee in their deliberations and in particular to examine the following items:

(1) To determine the location and identification of asbestos within the Saskatchewan Power Corporation.
(2) The procedures for handling asbestos and recommend procedures.
(3) The provision and maintenance of adequate protective equipment.
(4) The monitoring of persons and areas involving asbestos procedures.
(5) The training of personnel and supervisors in asbestos procedures.
(6) Review the documentation of all workers including supervisors who have been exposed to asbestos.
(7) Review the role of the Occupational Health Committees within S.P.C. operations in regards to procedures for handling asbestos.
(8) Review the role of the Occupational Health and Safety Units of S.P.C. in the monitoring of asbestos removal procedures.
(9) Review the internal systems of responsiblity and accountability within S.P.C. to ensure that the asbestos procedures are adequately followed.

(10) To report to the Minister on the recommendations of the Committee within 90 days.

Accordingly a nine member committee was appointed, Robert McWillie of Workers' Compensation Board of Regina was appointed as Chairman, and as members:

Jack Chapman	Deputy Operating Supt., B.D.P.S., Estevan O.H.C. Co-chairperson
Remi Donais	Laboratory Technician, B.D.P.S., Estevan O.H.C. Co-chairperson I.B.E.W.
Don Grant	Director of Safety and Occupational Health S.P.C., Regina
Gordon Gunoff	Station Electrician, Q.E.P.S., Saskatoon O.H.C. Co-chairperson I.B.E.W.
Thomas McLay	Instrument Technician, Coronach O.H.C. Co-chairperson I.B.E.W.
Russ Pratt	Representative, E.C.W.U. Regina
Roy Yeske	Director, Trans. Facilities Engineering S.P.C. Regina
Alex Young	Manager, Support Services S.P.C. Regina

It is worthy to note that the Asbestos Review Committee consisted of approximately 185 years of total work experience in the work places being reviewed and covered experience in occupation classifications in which asbestos is the most prevalent within the Saskatchewan Power Corporation. The above stated experience was invaluable in drafting this report.

Mr Herb Wooley, Occupational Hygienist of the Occupational Health and Safety Branch, Department of Labour, acted as Secretary to the Asbestos Review Committee. His occupational hygiene experience and expertise and specifically his knowledge relating to the operation of the Occupational Health and Safety Branch and its Legislation and Regulations were of extreme benefit to the Committee.

The Asbestos Review Committee toured various facilities of the Saskatchewan Power Corporation with special attention to power plants to determine the extent and condition etc. of asbestos as it exists within the Saskatchewan Power Corporation. Further a series of meetings were held to meet with Occupational Health and Safety Branch officials and medical personnel.

The Asbestos Review Committee expresses its thanks to all those people who assisted in research and provision of information and the cooperation received from all the staff of the Saskatchewan Power Corporation during the tours of their facilities.

PREFACE

The Asbestos Review Committee examined many documents, reports, etc. relating to studies already done on asbestos, with particular attention to the Ontario "Royal Commission on Asbestos 1982."

The above referred to reports covered the asbestos subject matter in various aspects, many of which were of a detailed and technical nature, and all of the briefs raised the serious question of the health effect upon workers or individuals who may be exposed to asbestos in various forms.

The Asbestos Review Committee agreed that based on those reports that it could come to no other conclusion than that the material is an extremely dangerous substance, and therefore recommends its future use be eliminated on new installations, and that existing asbestos on all S.P.C. property be identified, and either removed or secured to insure no health risks to its workers or the public.

Saskatchewan regulations acknowledge that there is no level of asbestos which is entirely free from risk of ill health. Rather than set a level of airborne fibres which is deemed an acceptable risk to workers, employers are asked to take measures to prevent exposure. They are responsible for controlling fibres which may be released into the air where workers work, (Section 108 - Occupational Health and General Regulations), and also which are released as a result of handling, using or producing asbestos in the workplace (Section 71 - Occupational Health and General Regulations). They cannot be held responsible for asbestos fibres which enter the workplace from the general outside environment.

The first major step taken by the Asbestos Review Committee was a review of existing procedures within the Saskatchewan Power Corporation. A draft document titled "Guidelines for Identification and Control of Asbestos and Asbestos Health Hazards" had been prepared by the Saskatchewan Power Corporation and was reviewed in extensive detail and is attached as Appendix "A": and is part of this report.

RECOMMENDATIONS

With respect to the terms of Reference, a number of specific recommendations are covered in Appendix "A", however, the general recommendations are as follows:

ITEM #1

To determine the location and identification of asbestos within Saskatchewan Power Corporation.

An indepth study was undertaken by the Asbestos Review Committee in regards to the location and identification of asbestos within facilities of the Saskatchewan Power Corporation.

That study indicated beyond all doubt that asbestos is a common substance found in various forms throughout the entire system not only its widespread use in the Power Plants but in a large number of the building structures, such as compressor stations, switchyard buildings and warehouses, etc. The condition of asbestos material observed during the tours was generally not acceptable and indicates an urgency in identification and remedial action. In light of the foregoing, the Asbestos Review Committee discussed various methods of identification systems that could be used and, therefore, recommends:

(A) That a Building Data Sheet be established for each of its buildings on the S.P.C. property which would contain the Building location and number, building utilization, occupancy with approximate numbers of staff, type of construction, heating system, electrical system and the present method of encapsulation or enclosure of asbestos.

(B) The Building Data Sheet be located in each building in such a manner that it would be readily accessible to employees who may be required to work in the area where asbestos may be located.

(C) The Building Data Sheet be filed with a central office within the administrative structure of S.P.C. with proper authority to ensure its continued establishment and regular updating in the event of major renovations of the buildings on Sask. Power property.

ITEM #2

The procedures for handling asbestos and recommended procedures are covered in Appendix "A." However, it must be clearly understood that appropriate training must be undertaken with supervision and staff, particularly for those who may be involved with asbestos to ensure they are appropriately informed.

Further that the above referred to training is not intended to replace specific training or instructions that are required before specific work projects are undertaken by employees as provided under Section 68 of the Occupational Health and General Regulations.

ITEM #3

The provision and maintenance of adequate protective equipment are covered in Section 5.0 of Appendix "A" and is based on the latest knowledge available to the Committee. It would be understood that the equipment section would be updated as additional acceptable equipment comes on the market.

ITEM #4

The monitoring of persons and areas involving asbestos procedures are covered in Section 3.0, 5.0 and 6.0 Appendix "A."

ITEM #5

The training of personnel and supervisors in asbestos procedures.

The Saskatchewan Power Corporation has a long history of training experience in various areas of trades training and other related personnel programs. Those programs are recognized as among the best in the electrical and gas utility industry in Canada.

Those programs are there and continue to be there as a result of the commitment by the top officials of the S.P.C.

That same commitment must be insured by top management in all health and safety matters including asbestos.

We would draw to your attention to exemplify the detail of training desired by the Asbestos Review Committee, recommendation 8.8 from the Report of the Royal Commission on Matters of Health and Safety Arising from the Use of Asbestos in Ontario:

> "Every employer with a control programme must select persons who have supervisory positions for training in the nature of the hazards posed by asbestos, and in identifying and dealing with the specific workplace situations that may be most hazardous.
>
> The number of persons trained should be sufficient to ensure that one such person will be on duty in the plant at all times when its operation or maintenance entails worker exposure to asbestos."

ITEM #6

Review the documentation of all workers including supervisors who have been exposed to asbestos.

The Asbestos Review Committee in examining the question of documentation of workers could find no mandatory or statutory regulation requiring the reporting to a central agency or for that matter the requirement for any employers to keep records of their employees' contacts or exposure to asbestos.

The Saskatchewan Power Corporation on its own initiative undertook and has established a centralized documentation centre for asbestos exposure through its Safety Division for its employees who have been exposed. That information is then passed on to The Workers' Compensation Board and is placed on an asbestos registry file for future reference if required.

The above noted procedure facilitates the compliance with Section 119 of the Occupational Health and General Regulations pertaining to medical examinations.

The Asbestos Review Committee commends the Saskatchewan Power Corporation for its actions in this regard. Some minor recommendations in the documentation include the provision for the nature, location and duration of exposure. Further they should continue their efforts to locate and advise and add to their registry those employees who may have been exposed prior to the establishing of the documentation list.

The Asbestos Review Committee in its deliberations became aware of a serious problem relating to contractors. Contractors do renovation work for the Saskatchewan Power Corporation to existing facilities that may contain asbestos or may be involved in the removal of asbestos. The workers are employed and controlled by the contractors, who have no documentation procedure.

The Asbestos Review Committee became aware of the recommended proposed Regulation respecting asbestos presently being considered in the Province of Ontario dated November 16, 1984. The Committee strongly recommends to the Minister of Labour that in consultation with the Occupational Health and Safety Branch of the Department of Labour mandatory reporting procedures be established similar to those being proposed in the Province of Ontario. This is to insure proper medical surveillance and with a central exposure registry data system through Workers' Compensation or the Occupational Health and Safety Branch, Department of Labour.

The other area of concern relates to an owner such as the Saskatchewan Power Corporation selecting a competent contractor who has the proper equipment, knowledge, expertise and properly trained staff to carry out the work in a safe manner. This is not only for the safety of the contractors' employees, but also for the employees of the owner who are working and who may become exposed if the work is not carried out in a safe manner.

The Asbestos Review Committee sees only two alternatives in this area:

(A) The owner such as Saskatchewan Power Corporation must ensure that the work they tender goes only to contractors with the expertise and trained personnel to carry out the work safely and, therefore, use an invitational bid system or -

(B) The Labour Department establish a Registry of contractors with the appropriate expertise and training and restrict the work of removal of asbestos to those contractors.

The Chairman met with some of the contractors presently doing this work and is of the opinion that the Labour Department Registry method could be established in cooperation with those employers presently working in the industry.

ITEM #7

Review of the Role of Occupational Health Committee within Saskatchewan Power Corporation's operations in regards to procedures for handling asbestos.

The Asbestos Review Committee examined the structure of the Occupational Health Committees within the Saskatchewan Power Corporation and found that both Unions within Saskatchewan Power and the Company have established the proper committees using various methods of selection to insure appropriate representation of the groups which they represent on the Committees.

The Asbestos Review Committee in a review of the Occupational Health and Safety Act found compliance with the Act in establishing Committees. However, individual Union members or supervisors serving on the Committees may well not be fully knowledgeable in regards to the intent and workings of the Committees as outlined in the Act.

In light of the foregoing the Asbestos Review Committee unanimously agrees that appropriate training be established for these Committees, conducted by appropriate personnel of the Occupational Health and Safety Branch, Department of Labour who are directly involved in the proper administration and application of the Committees and the Act. Such a system existed a few years ago and should be reinstituted by the Department of Labour.

The above procedure would have beneficial effects in other areas of health and safety beyond those dealing with asbestos.

It is worthy to note that the Saskatchewan Power Corporation has tried to overcome the problems stated by establishing their own training program. However, the Asbestos Review Committee emphasizes and recommends that the training would be more effective if delivered by the administrators of the Act within the Occupational Health and Safety Branch of the Department of Labour.

Specifically dealing with the Occupational Health Committee's role, the Asbestos Review Committee would recommend the following terms of reference::

(1) Participate in the control of the S.P.C. Procedures for the Handling of Asbestos within S.P.C. - specifically this includes that adequate protective equipment is in place, that personnel involved in the handling of asbestos are monitored, that regulations now in effect are being followed.

(2) The establishment and promotion of health and safety programs for the education and information of workers regarding asbestos.

(3) The investigation of any asbestos matter referred to the committee under Section 26 of the Act.

ITEM #8

Review the role of the Occupational Health and Safety Units of S.P.C. in the monitoring of asbestos removal procedures.

With the appropriate training of Occupational Health Committees referred to earlier in this report, the employer should in the individual cases of asbestos work and particularly where specific asbestos projects are undertaken make the Co-Chairpersons aware of the nature of the work including attending pre-job lay out meetings so the committees will be able to constructively assist in the monitoring of the work.

ITEM #9

Review of the internal systems of responsiblity and accountability within S.P.C. to ensure that the asbestos procedures are adequately followed.

This section of the Terms of Reference certainly is a most difficult area to report on due to the fact that success or failure of safety programs are governed by the degree and attitude to which top management is involved in safety matters and in that regard it is appropriate to quote from a previous audit report done by Middle West Service Company for the Saskatchewan Power Corporation, specifically;

"MANAGEMENT POLICIES, DIRECTIVES AND ATTITUDES

It has long been recognized that the degree to which top management has a direct involvement in safety matters is reflected in the success or failure of the safety programs of their companies. During the audit, there was no indication that there was any direct involvement by any member of top management personnel and into the safety activities of the organization. However, there certainly is an indirect effect of their involvement and an example of this is that the General Manager made the recommendation that resulted in the audit being made, so it is apparent that there is interest and involvement. However, from the standpoint of employees, it would be highly desirable if this involvement were more visible."

Further in review of the specific operation of the Occupational Health Committees, two specific complaints were constantly being brought forward:

(A) In the event that a matter had been raised at a local Occupational Health Committee meeting, and that issue had not been resolved within a reasonable time, there was no clearly defined provision to refer to a higher authority within the established structure to insure appropriate action. Examples include local management did not react at the local level on an item, or instances where employees were not conducting themselves in an appropriate fashion by not wearing proper protective equipment, etc.

(B) In a number of cases, Department of Labour, Occupational Health Officers are on the scene long before top union or management officials are fully aware or had the opportunity to respond or take the appropriate corrective action on a given problem. Again the problem would seem to result of a lack of a clearly defined referral structure.

To seek the answer to the above stated probems, it is necessary to review the S.P.C. and Trade Unions' present structure relating to safety.

There are two collective agreements with S.P.C. covering their staff. Each contain provision for a Joint Safety Committee at the top administrative level and again there appeared to be lack of clarity as to the function of those committees although it is clear that S.P.C. Safety Division play a major role in their function.

Further there are a number of committees and groups that deal on regular or ad hoc manner with Safety and Occupational Health matters such as:

Standard Protection Committee
Gas Standard Committee
Rehabilitation Committee
Occupational Health Committees (65)
Bare-hand Committee
Hazardous Chemical Committee
Boards of Inquiry

and from time to time others are added such as the present Asbestos Review Committee.

Saskatchewan Power Corporation Safety Department plays a major role in all of the referred to committees by authority, chairmanship, sponsoring or participation in the groups.

The S.P.C. Safety Division is the only group with an overview of practically all safety matters within S.P.C.

Therefore, the S.P.C. and the two Unions should immediately begin discussion to establish a Central Occupational Health and Safety Council consisting of the following:

Chairman - Director of Safety
2 members appointed by the President
2 I.B.E.W. members, one of which must be
of the joint I.B.E.W.Committee
2 E.C.W. members, one of which must be
of the joint E.C.W. Committee

Not withstanding the formation of the Central Council, an in-house asbestos committee should be established immediately to determine time lines and target dates for the implementation of these recommendations and to provide an ongoing review of activities.

The above named council could be expanded to include representation from the previously mentioned committees. The Asbestos Review Committee recognizes that further minor modifications may be required following discussions between management and the two unions.

The council would meet every three months or at the call of the Chairman.

The council would review operations of all committees to insure proper functioning.

The council would be responsible for themselves or for delegating to the appropriate committee the establishment of health and safety awareness programs.

The council may request reports from any committee on safety and occupational health matters.

The council would be the referral body for problems within Occupational Health Committees. The function of the Central Occupational Health and Safety Council must be spelled out clearly so that all personnel serving on Occupational Health Committees know the procedure in the event of problems.

The minutes and reports and actions of the Central Occupational Health and Safety Council shall be reported directly to the S.P.C. President.

This Central Occupational Health and Safety Council if properly structured should provide a central body which could react more readily and have access to information or be in a position to obtain authority to act if necessary far more readily than has been the situation in all cases in the past.

The council should review the yearly Safety Action Plan.

The council would have another beneficial effect in that local Committees would not have to rely on Department of Labour personnel for assistance which after all is the employer's responsiblity.

The Director of Safety would have, through management structures, a ready supply of expertise available for use in safety matters, (except in the area of an Occupational Hygienist for matters relating to air sampling asbestos tests and the whole range of chemicals in use by S.P.C.) Therefore, it is strongly recommended that the S.P.C. hire their own Occupational Hygienist.

This Committee must re-emphasize how vital the Middle West Service Company (i.e. Mr. L. Westrom) approach is to the success of implementing these recommendations. Specifically, to ensure that the asbestos procedures developed are followed, continuity of support from senior management is fundamental.

The Central Occupational Health and Safety Council would act as a clearing house for all of the unresolved issues from other Committees. All of its reports shall go directly to the President of S.P.C. to ensure that top management are kept current and abreast of activity on health and safety matters.

This structure then ensures top management awareness. It then must be followed through to ensure that supervisors' attitudes demonstrate that higher management wholeheartedly supports all occupational health and safety programs.

Further, with this awareness in occupational health and safety areas such as asbestos, they will be able to assess and make the necessary financial commitments to effectively deal with the problems.

The Asbestos Review Committee also draws your attention to the following items:

a) An in-house asbestos committee should be established to continue the work of this Asbestos Review Committee to complete the task that lies ahead.

b) As a result of tours of S.P.C. facilities, the Asbestos Review Committee is concerned with the level of general housekeeping in power plants. The S.P.C. should give serious consideration to have their cleaning done by in-house staff due to the involved nature of the work, even if this requires additional staff to do the job.

c) Certain items which go beyond S.P.C. may require action by the Minister of Labour, i.e. a registry of asbestos removal contractors.

On behalf of the Asbestos Review Committee and myself as Chairman, we thank all of those people within the local unions and management who cooperated so willingly to assist in this report, especially bearing in mind the restricted time allotted for the report.

Respectfully submitted

Robert McWillie, Chairman

Jack Chapman

Remi Donais

Don Grant

Gordon Gunoff

Thomas McLay

Russ Pratt

Roy Yeske

Alex Young